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KEVIN R. WEIMER, Clerk
By: *Sky* Deputy Clerk

IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF GEORGIA

ATLANTA DIVISION

NATALIE SOTO,

Plaintiff,

v.

Civil Action File No.: 1:24-cv-02911-SDG

WENDELL HOLMES, JR.,

Defendant.

DECLARATION OF WENDELL HOLMES, JR.

I, Wendell Holmes, Jr., declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge, information, and belief:

1. My name is Wendell Holmes, Jr., and I am the Defendant in this matter. I am over the age of 18 and competent to testify to the facts stated herein.
2. I met the Plaintiff, Natalie Soto, around mid to late September 2023. From the beginning, she was aware that I was married. She never came to my home, and our in-person interactions occurred either in public or at her residence.
3. Our primary communication was via text messages. We typically met once a week for two to three hours, mainly during October 2023. In November and December, our interactions were minimal due to my travel schedule—including a funeral, a convention in Indiana, and the Thanksgiving and Christmas holidays—as well as my wrist surgery in December.
4. Natalie became upset that she could not be with me during my surgery recovery and expressed frustration that my wife, not her, was caring for me. This led to an argument.

5. Throughout our interactions, Natalie frequently encouraged me to leave my wife. She offered financial support, gifts, the use of her credit card, and even suggested that I move into her new home in January 2024. These offers were persistent and clearly intended to pressure me into ending my marriage.

5A. In December, although I declined, she insisted on giving me Christmas gifts, stating it was something she truly wanted to do.

5B. She also offered to pay my bills during my recovery and told me not to worry about repaying her. I declined most offers, and on the one occasion I accepted, I later offered to reimburse her, but she refused.

5C. She became visibly upset when I was unavailable, especially during the holidays.

5D. In early December, she was angry that I was spending the holidays with my wife and not her.

5E. A week or two after we first met, she loaned me her Land Rover and credit card to take a solo trip to Nashville.

6. In November 2023, we had an argument when she revealed her intent to hang large canvas prints of her own nude photos on her living room and bedroom walls. She told me she was comfortable with others seeing her nude.
7. Natalie regularly posted sexually suggestive content online, including videos of herself dancing on a home stripper pole. These public posts contradict her claims of emotional distress over the private sharing of one photo.
8. Natalie claimed in her affidavit that after nearly two months of no communication, I reached out to her from an unfamiliar number on February 22, 2024. This is false. After six to seven weeks of silence, she was the one who first contacted me via my main phone number, demanding \$900 for surgery for her dog, Bob.
9. After multiple unprovoked and threatening messages—including a warning that she would contact my wife—I replied with, “Here is her cell number. You can call her directly.” I then blocked her number. The next day, my wife informed me that Natalie had posted about me in the Facebook group “Are We Dating the Same Guy?” and had messaged her asking for \$1,700.
10. I only contacted Natalie from a Google Voice number after learning about her public post and its effect on my wife. Natalie’s affidavit omits this entire chain of events, which falsely portrays me as the one who reinitiated contact.

11. Natalie's decision to post publicly about me nearly two months after no contact suggests ulterior motives, such as damaging my reputation, extorting money, or retaliating because I refused her advances. If she had truly ended the relationship back in January, her actions in February make no logical sense.
12. She proceeded to contact my wife, my sister-in-law, and others via Facebook Messenger, spreading false and defamatory statements about me. She messaged my sister-in-law repeatedly to the point where she had to block Natalie for harassment.
13. In the Facebook group post, Natalie publicly revealed my first name and a photo of me beside a drum set—despite claiming in her affidavit that she only used my first name. As a recognizable figure in the music industry, this disclosure made it easy for others to identify me. I have never claimed to be single on any dating platform.
14. After receiving her threats in February, I had no contact with Natalie until I was served with a restraining order request in March 2024, which the judge ultimately dismissed.
15. After the hearing, I called Natalie once to ask why she was pursuing this matter further. I questioned her reasoning for seeking criminal charges and filing a civil lawsuit if the image truly caused her distress, knowing it would now be viewed by attorneys, judges, and possibly jurors.
16. In January 2024, Natalie resumed a romantic relationship with her ex-husband and vacationed with him in February—the same time she was threatening and harassing me for money.
17. Despite claiming emotional and professional harm, Natalie posted on social media that she landed her dream job. In contrast, I lost employment due to being arrested at my church job on Father's Day 2024 as a result of her criminal complaint.
18. During my deposition, Natalie Soto, Dawn Douglas, and Attorney Joseph Weeks distributed nude photos of another woman unrelated to this case. This act undermines the seriousness of their allegations and demonstrates the very conduct they claim to condemn.
19. Attached as Exhibit A is a true and correct copy of the email from Pleasant Grove Missionary Baptist Church terminating my employment following my arrest.
20. Attached as Exhibit B is a true and correct copy of the arrest warrant issued based on the Plaintiff's claims.
21. Attached as Exhibit C is a set of still images captured from Plaintiff's publicly available social media posts, demonstrating lack of financial or emotional distress.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 14th day of April, 2025, in Mableton, Georgia.

Respectfully submitted,



Wendell Holmes, Jr.

Defendant, Pro Se

5934 Rosie LN SE

Mableton, GA 30126

404-664-2943

Wendellholmesjr@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Declaration of Wendell Holmes, Jr. with attached exhibits upon the Plaintiff's counsel by electronic filing and/or U.S. Mail addressed as follows:

Joseph W. Weeks

McNally Weeks

125 Clairemont Avenue, Suite 450

Decatur, GA 30030

Email: jweeks@mcnallyweeks.com

This 14th day of April, 2025.



Wendell Holmes, Jr.

Defendant, Pro Se

8 Messages

Sunday June 16, 2024

ER

Elaine Redmond

6/17/24

To: Wendell Cc: Harry, Celia, Rodney & 4 more... >

Good Evening Wendell,

In light of yesterday's unfortunate series of events during your contracted work hours at Pleasant Grove Missionary Baptist Church located at 566 Whitlock Avenue NW, Marietta, Georgia, 30064, we are moving to dissolve your services with us as an independent contractor playing drums for our worship services. Your last day of contracted employment will be dated as of yesterday, June 16, 2024. The check you received on yesterday is your compensation for the date referenced above. As such, we do not owe you any further compensation for services rendered.

Additionally, it has come to our attention that you still have personal property inside the church. I am told it is a book bag and a set of keys. We will have all personal items shipped to the address we have on file for you via overnight shipping.

Thank you for your cooperation in this matter.

Respectfully,

CRIMINAL WARRANT

Warrant No. 24-W-3636

Case No. 24016333

**MAGISTRATE COURT OF COBB COUNTY
GEORGIA**

Warrant No. 24-W-3636

Police Case No. 24016333

Personally came Ben H King, who makes oath before a Magistrate of this Court that Wendell Holmes (hereinafter called the accused) did,

between Feb 22, 2024 12:00 PM to Feb 23, 2024 12:00 AM at 5934 Rosie Ln, Mableton, County of COBB, GA 30126 commit the offense of UNLAWFUL INVASION OF PRIVACY(F) violating O.C.G.A. Section 16-11-42. Said accused did sell, give, or distribute, without legal authority, to any person or entity any photograph, videotape, or record, or copies thereof, of the activities of another which occur in any private place and out of public view without the consent of all persons observed, to wit: Said accused shared nude photographs of the victim, Natalie Soto, with a stranger, Dawn Douglas, via Facebook Messenger (social media) after an argument with Soto via text message.;

between Feb 22, 2024 12:00 PM to Feb 23, 2024 12:00 AM at 5934 Rosie Ln, Mableton, County of COBB, GA 30126 commit the offense of HARASSING COMMUNICATIONS(M) violating O.C.G.A. Section 16-11-39.1(a)(1), said accused did contact another person, Natalie Soto, repeatedly via telecommunication, e-mail, text messaging, or any other form of electronic communication for the purpose of harassing, molesting, threatening, or intimidating said victim or the family of said victim, to wit: Natalie Soto created a post on Facebook group "Are We Dating The Same Guy? | Atlanta/Athens/ Marietta/Georgia" warning users about Said Accused. Said Accused then began contacting Soto via text message; he made statements such as "Don't forget to lock your doors" and "Not mad at all. I get even...I can play better..." and "U got til noon to delete everything you posted about me on this Facebook group b4 I make your life a living hell and really expose you." Said accused is heard on a recorded phone conversation saying "I know where you live now" and "everybody is about to see your photos.";

and affiant makes this affidavit that a warrant may issue for the arrest of the accused.

BRK

Affiant: Ben H King
Badge No. cc2663

Sworn to and subscribed before me, this 4/17/2024 1:49:31 PM

Ch.